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Attorneys for Defendant MARTIN KAO

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

PACMAR TECHNOLOGIES LLC (f/k/a  
MARTIN DEFENSE GROUP, LLC) AND  
NAVATEK HOLDINGS LLC

Plaintiffs,

v.

MARTIN KAO; TIFFANY JENNIFER  
LAM a.k.a. JENNY LAM and/or  
TIFFANY KAO; LAWRENCE  
KAHELE LUM KEE; CLIFFORD  
CHEN; DUKE HARTMAN; SOCIETY OF  
YOUNG WOMEN SCIENTISTS AND  
ENGINEERS LLC,

Defendants.

) Case 1:22-cv-00283-LEK-  
) WRP  
)  
)  
) DEFENDANTS MARTIN  
) KAO, TIFFANY  
) JENNIFER LAM aka  
) JENNY LAM and/or  
) TIFFANY KAO, AND  
) SOCIETY OF YOUNG  
) WOMEN SCIENTISTS  
) AND ENGINEERS, LLC'S  
) ANSWER TO SECOND  
) AMENDED COMPLAINT  
)  
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**DEFENDANTS MARTIN KAO, TIFFANY JENNIFER LAM aka JENNY LAM and/or TIFFANY KAO, AND SOCIETY OF YOUNG WOMEN SCIENTISTS AND ENGINEERS, LLC’S ANSWER TO SECOND AMENDED COMPLAINT**

COME NOW DEFENDANTS MARTIN KAO, TIFFANY JENNIFER LAM aka JENNY LAM and/or TIFFANY KAO, AND SOCIETY OF YOUNG WOMEN SCIENTISTS AND ENGINEERS, LLC (“Kao/Lam/SYWSE Defendants”), through counsel, and for an answer to Plaintiffs’ Second Amended Complaint (“SAC”), respond and aver as follows:

**PREFATORY STATEMENT REGARDING FEAR OF CRIMINAL JEOPARDY**

1. Defendant Martin Kao faces criminal charges relating to what is described in the SAC as “The PPP Fraud.” *See* SAC at par. 151 *et seq.* He was initially charged by Criminal Complaint. *See* <https://www.justice.gov/opa/press-release/file/1322841/download>.

2. Later, he was charged by indictment. His trial was scheduled for February, 2023. Currently, sentencing is scheduled for September 7, 2023.

3. An indictment against Mr. Kao for alleged campaign finance violations was filed on February 10, 2022, in federal district court in the District of Columbia. *See* Press Release: <https://www.justice.gov/opa/pr/former-government-contractor-executives-indicted-unlawful-campaign-contributions>; *see* Indictment <https://www.justice.gov/opa/press-release/file/1470801/download>.

4. Defendants Lum Kee and Chen are also named as defendants in the indictment in the District of Columbia action. Currently, sentencing has not yet occurred for Defendant Kao in the District of Columbia action.

5. Defendant Tiffany Lam is not named as a defendant but she is identified as “Individual A” in the indictment in the District of Columbia action. *See* Indictment (dkt. #1 in District of Columbia action) at par. 6 (“Individual A was KAO’s spouse and the registered agent and manager for the [Society of Young Women Scientist and Engineers].”).

6. In the instant SAC, including paragraph 31 of the SAC and the prayer for relief, Plaintiffs assert that Defendant Society of Young Women Scientists and Engineers (“SYWSE”) is an alter ego of Defendants Kao and/or Lam. There is a reasonable risk that any statement by SYWSE will be used against Defendants Kao and/or Lam and/or will be claimed to be imputed to Defendants Kao and/or Lam.

7. For purposes of this case, the allegation is that SYWSE does not exist separately from the individual member.

8. There is a risk that any statement by Defendant SYWSE will be alleged to be a statement by Defendant Lam, or a statement by Defendant Lam and Defendant Kao.

9. Under the circumstances of this case, all defendants are entitled to assert the privilege against self-incrimination.

10. Further, to the extent Burwell v. Hobby Lobby Stores, Inc., 573 U.S. 682, 134 S. Ct. 2751, 189 L. Ed. 2d 675 (2014), Citizens United v. Fed. Election Comm’n, 558 U.S. 310, 130 S. Ct. 876, 175 L. Ed. 2d 753 (2010), and related cases can be recognized to extend the privilege of self-incrimination to entities, SYWSE is entitled to such protection.

11. The campaign finance case has attracted national attention.  
<https://www.washingtonpost.com/dc-md-vi/2022/02/10/hawaii-contractors-charged-contributions-collins/>

12. On January 5, 2023, an indictment was brought against Martin Kao in CR23-0003, United States District Court for the District of Hawaii. The indictment asserts a claim for bank fraud and forfeiture relating to 4902 Kahala Avenue, Honolulu, Hawaii.

13. Kao/Lam/SYWSE Defendants do not waive their privilege against self-incrimination as set forth the Fifth Amendment of the United States Constitution, Article I, Section 10 of the Hawai’i Constitution and Hawai’i Rule of Evidence 509 (hereinafter “Privilege against Self-Incrimination”).

### **FIRST DEFENSE**

14. The SAC fails to state a claim upon which relief can be granted.

### **SECOND DEFENSE**

15. With regard to the specific paragraphs of the SAC, Kao/Lam/SYWSE

Defendants respond as follows (“MDG” or “Pacmar” refer to Plaintiff PACMAR TECHNOLOGIES LLC (f/k/a MARTIN DEFENSE GROUP, LLC)):

<b>Paragraph number of SAC</b>	<b>Response</b>
1	Kao/Lam/SYWSE Defendants deny the allegations.
2	Kao/Lam/SYWSE Defendants admit the allegation with the qualification that Martin Defense Group, LLC was formerly known as Navatek LLC. The reference to all relevant times is ambiguous.
3	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
4	This allegation does not require a response. To the extent a response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
5	Kao/Lam/SYWSE Defendants admit the allegation.
6	Kao/Lam/SYWSE Defendants admit the allegation.
7	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
8	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
9	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.

10	Kao/Lam/SYWSE Defendants admit the allegation but the reference to all relevant times is vague and ambiguous.
11	This allegation does not require a response. To the extent a response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
12	This allegation is denied. Kao/Lam/SYWSE Defendants deny the existence of an enterprise for purposes of all allegations.
13	This allegation is denied.
14	This allegation is denied.
15	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
16	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
17	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
18	Kao/Lam/SYWSE Defendants deny illegal and racketeering conduct and deny the allegations.
19	Kao/Lam/SYWSE Defendants deny any pattern of racketeering, deny any enterprise, and deny any conspiracy relating to same.
20	Kao/Lam/SYWSE Defendants admit that Defendant Tiffany Lam is and was Defendant Kao's wife.
21	Kao/Lam/SYWSE Defendants admit the allegation with the qualification that MDG was formerly known as Navatek LLC. Also, in 2008, the entity Mr. Kao worked for is believed to be Navatek Ltd. The name change and conversion are matters of public record.

22	Kao is without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
23	Details of Kao employment history are matters that should be known to Pacmar from its records. Kao is not aware of Mr. Loui being a direct owner and Chairman of the Company. To the extent further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
24	Kao/Lam/SYWSE Defendants assert that the Award and its legal effect is a matter that is determined as a matter of law.
25	Kao/Lam/SYWSE Defendants admit that Defendants Chen, Lum Kee, and Hartman had been employed by MDG. Details of their employment history are matters that should be known to Pacmar from its records. To the extent further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
26	Details of Defendant Chen's employment history are matters that should be known to Pacmar from its records. Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
27	Details of Defendant Hartman's employment history are matters that should be known to PACMAR from its records. To the extent a response is required, Defendant Kao leaves the characterization of Defendant Hartman's duties to Defendant Hartman.
28	Details of Defendant Lum Kee's employment history are matters that should be known to PACMAR from its records. To the extent a response is required, Defendant Kao leaves the characterization of Defendant Lum-Kee's duties to Defendant Lum-Kee.
29	Kao/Lam/SYWSE Defendants deny the allegations.

30	SYWSE's records speak for themselves. As for the remaining allegations, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
31	Kao/Lam/SYWSE Defendants deny the alter ego allegations. As for the remaining allegations, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
32	Kao/Lam/SYWSE Defendants deny the allegations.
33	These assertions are directed at Defendant Chen and do not require a response from Kao/Lam/SYWSE Defendants. To the extent a response is required, Defendant Kao admit that Defendant Chen was a CFO but leaves the characterization of his duties to Defendant Chen.
34	These assertions are directed at Defendant Chen and do not require a response from Kao/Lam/SYWSE Defendants. To the extent a response is required, Defendant Kao admits that Defendant Chen was a CFO but leaves the characterization of his duties to Defendant Chen.
35	These assertions are directed at Defendant Chen and do not require a response from Kao/Lam/SYWSE Defendants. To the extent a response is required, Defendant leaves the characterization of Defendant Chen's experience to Defendant Chen.
36	These assertions are directed at Defendant Chen and do not require a response from Kao/Lam/SYWSE Defendants. To the extent a response is required, Defendant Kao admits that Defendant Chen was a CFO but leaves the characterization of Defendant Chen's duties to Defendant Chen.
37	These assertions are directed at Defendant Chen and do not require a response from Kao/Lam/SYWSE Defendants. To the extent a response is required, Defendant Kao leaves the characterization of Defendant Chen's duties to Defendant Chen.



38	These assertions are directed at Defendant Chen and do not require a response from Kao/Lam/SYWSE Defendants. To the extent a response is required, Defendant Kao leaves the characterization of Defendant Chen's duties to Defendant Chen.
39	These assertions are directed at Defendant Hartman and do not require a response from Kao/Lam/SYWSE Defendants. To the extent a response is required, Defendant Kao admits that Defendant Hartman was an employee but leaves the characterization of his duties to Defendant Hartman.
40	Kao denies any conspiracy. With regard to the remaining allegations, Kao is without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
41	These assertions are directed at Defendant Hartman and do not require a response from Kao/Lam/SYWSE Defendants. To the extent a response is required, Defendant Kao leaves the characterization of Defendant Hartman's duties to Defendant Hartman.
42	These assertions are directed at Defendant Hartman and do not require a response from Kao/Lam/SYWSE Defendants. To the extent a response is required, Defendant Kao leaves the characterization of Defendant Hartman's duties to Defendant Hartman.
43	These assertions are directed at Defendant Hartman and do not require a response from Kao/Lam/SYWSE Defendants. To the extent a response is required, Defendant Kao leaves the characterization of Defendant Hartman's duties to Defendant Hartman.
44	Defendant Kao admits that Mr. Lum Kee was hired and that he was a controller. Defendant Lum Kee's hiring date and duties are matters that should be ascertainable from PACMAR's records.
45	Defendant Kao leaves to Defendant Lum Kee to admit or deny the alleged scope of this duties. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or

	information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
46	Defendant Kao leaves to Defendant Lum Kee to admit or deny the alleged scope of this duties. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
47	Defendant Kao leaves to Defendant Lum Kee to admit or deny the alleged scope of this duties. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
48	Defendant Kao leaves to Defendant Lum Kee to admit or deny the alleged scope of this duties. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
49	Kao/Lam/SYWSE Defendants deny the allegations against them.
50	Details of employment history are matters that should be known to PACMAR from its records. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
51	Details of employment history are matters that should be known to PACMAR from its records. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
52	Kao/Lam/SYWSE Defendants deny the allegations.
53	Defendant Kao denies any conspiracy. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.

54	Kao/Lam/SYWSE Defendants deny any enterprise. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
55	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
56	Defendant Lam's certification is a matter of public record. Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
57	Defendant Kao's certification is a matter of public record. Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
58	This assertion is directed at Defendant Lum Kee. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
59	Defendant Lam denies any wrongdoing. To the extent a further response is required, Defendant Lam is without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
60	Defendant Lam denies any racketeering. To the extent a further response is required, Defendant Lam is without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
61	Defendant Kao states that the document should speak for itself.
62	The status and purpose of the 1820 PAC is a matter that may be determined by public or other records.
63	Defendant Kao declines to respond to this allegation in reliance upon the Privilege against Self-Incrimination.

64	These allegations are directed at other defendants. To the extent the allegations are based on documents or company records, the documents speak for themselves. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
65	These allegations are directed at other defendants. To the extent the allegations are based on documents or company records, the documents speak for themselves. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
66	These allegations are directed at other defendants. To the extent the allegations are based on documents or company records, the documents speak for themselves. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
67	These allegations are directed at other defendants. To the extent the allegations are based on documents or company records, the documents speak for themselves. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
68	These allegations are directed at other defendants. Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
69	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
70	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.

71	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
72	Defendant Kao states that the document speaks for itself. To the extent a further response is required, Kao declines to respond to this allegation in reliance upon the Privilege against Self-Incrimination.
73	Defendant Kao states that the document speaks for itself. To the extent a further response is required, Kao declines to respond to this allegation in reliance upon the Privilege against Self-Incrimination.
74	Defendant Kao states that the document speaks for itself. To the extent a further response is required, Kao declines to respond to this allegation in reliance upon the Privilege against Self-Incrimination.
75	Defendant Kao states that the document speaks for itself. To the extent a further response is required, Kao declines to respond to this allegation in reliance upon the Privilege against Self-Incrimination.
76	The document speaks for itself.
77	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial. To the extent a further response is required, Kao declines to respond to this allegation in reliance upon the Privilege against Self-Incrimination.
78	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial. To the extent a further response is required, Kao declines to respond to this allegation in reliance upon the Privilege against Self-Incrimination.
79	Kao declines to respond to this allegation in reliance upon the Privilege against Self-Incrimination.

80	The document speaks for itself.
81	The records speak for themselves.
82	The records speak for themselves. To the extent further response is necessary, Kao declines to respond to this allegation in reliance upon the Privilege against Self-Incrimination.
83	The records speak for themselves. To the extent further response is necessary, Kao declines to respond to this allegation in reliance upon the Privilege against Self-Incrimination.
84	The document speaks for itself. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
85	The document speaks for itself.
86	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
87	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
88	Defendant Kao denies enlisting Hartman for any allegedly unlawful activities. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
89	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
90	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.

91	Kao/Lam/SYWSE Defendants deny any enterprise. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
92	The record in the criminal case speaks for itself.
93	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial. To the extent a further response is necessary, Kao/Lam/SYWSE Defendants decline to respond to this allegation in reliance upon the Privilege against Self-Incrimination.
94	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
95	Kao/Lam/SYWSE Defendants deny a conspiracy and are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
96	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial. To the extent a further response is necessary, Kao declines to respond to this allegation in reliance upon the Privilege against Self-Incrimination.
97	The alleged documents speak for themselves. To the extent a further response is required, Kao declines to respond to this allegation in reliance upon the Privilege against Self-Incrimination.
98	The alleged documents speak for themselves. To the extent a further response is required, Kao declines to respond to this allegation in reliance upon the Privilege against Self-Incrimination.
99	The alleged documents speak for themselves. These allegations relate to Hartman. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or

	information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
100	The alleged documents speak for themselves. These allegations relate to Hartman. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
101	The alleged documents speak for themselves. These allegations relate to Hartman. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
102	These allegations relate to Hartman. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
103	These allegations relate to Hartman. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
104	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
105	The alleged documents speak for themselves.
106	The alleged documents speak for themselves. To the extent a further response is required, Kao declines to respond to this allegation in reliance upon the Privilege against Self-Incrimination.
107	The alleged documents speak for themselves.
108	The alleged documents speak for themselves.



109	The alleged documents speak for themselves. To the extent a further response is required, Kao declines to respond to this allegation in reliance upon the Privilege against Self-Incrimination.
110	The alleged documents speak for themselves. To the extent a further response is required, Kao declines to respond to this allegation in reliance upon the Privilege against Self-Incrimination.
111	The alleged documents speak for themselves. To the extent a further response is required, Kao declines to respond to this allegation in reliance upon the Privilege against Self-Incrimination.
112	The alleged documents speak for themselves. To the extent a further response is required, Kao declines to respond to this allegation in reliance upon the Privilege against Self-Incrimination.
113	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
114	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
115	The records speak for themselves.
116	The records speak for themselves.
117	The records speak for themselves.
118	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.

119	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
120	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
121	The records speak for themselves.
122	The records speak for themselves.
123	Kao/Lam/SYWSE Defendants deny any enterprise. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
124	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
125	Kao/Lam/SYWSE Defendants deny any enterprise. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
126	The records speak for themselves.
127	The records speak for themselves.
128	The records speak for themselves. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
129	The records speak for themselves. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.

130	The records speak for themselves. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
131	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
132	The document speaks for itself.
133	The documents speak for themselves.
134	The documents speak for themselves.
135	The documents speak for themselves.
136	The documents speak for themselves.
137	The documents speak for themselves.
138	The documents speak for themselves.
139	The documents speak for themselves. To the extent a further response is required, Kao/Lam/SYWSE Defendants decline to respond to this allegation in reliance upon the Privilege against Self-Incrimination.
140	Kao/Lam/SYWSE Defendants deny any enterprise. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
141	The documents speak for themselves. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
142	The documents speak for themselves. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without

	knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
143	The documents speak for themselves. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
144	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
145	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
146	The records speak for themselves. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
147	The documents speak for themselves.
148	The documents speak for themselves.
149	Kao/Lam/SYWSE Defendants deny any enterprise and deny the allegations.
150	Kao/Lam/SYWSE Defendants state that the program speaks for itself.
151	Kao denies an unlawful conspiracy. To the extent a further response is required, Kao declines to respond to this allegation in reliance upon the Privilege against Self-Incrimination.
152	Kao denies an unlawful conspiracy. To the extent a further response is required, Kao declines to respond to this allegation in reliance upon the Privilege against Self-Incrimination.

153	Kao denies an unlawful conspiracy. To the extent a further response is required, Kao declines to respond to this allegation in reliance upon the Privilege against Self-Incrimination.
154	Kao denies an unlawful conspiracy. To the extent a further response is required, Kao declines to respond to this allegation in reliance upon the Privilege against Self-Incrimination.
155	Kao denies an unlawful conspiracy. To the extent a further response is required, Kao declines to respond to this allegation in reliance upon the Privilege against Self-Incrimination.
156	Kao denies an unlawful conspiracy. To the extent a further response is required, Kao declines to respond to this allegation in reliance upon the Privilege against Self-Incrimination.
157	Kao denies an unlawful conspiracy. To the extent a further response is required, Kao declines to respond to this allegation in reliance upon the Privilege against Self-Incrimination.
158	Kao denies an unlawful conspiracy. To the extent a further response is required, Kao declines to respond to this allegation in reliance upon the Privilege against Self-Incrimination.
159	Kao denies an unlawful conspiracy. To the extent a further response is required, Kao declines to respond to this allegation in reliance upon the Privilege against Self-Incrimination.
160	Kao denies an unlawful conspiracy. To the extent a further response is required, Kao declines to respond to this allegation in reliance upon the Privilege against Self-Incrimination.
161	The document speaks for itself.
162	The document speaks for itself.
163	The document speaks for itself.
164	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.

165	Kao declines to respond to this allegation in reliance upon the Privilege against Self-Incrimination.
166	The documents speak for themselves.
167	The documents speak for themselves.
168	Defendant Kao denies any enterprise. To the extent a further response is required, Kao declines to respond to this allegation in reliance upon the Privilege against Self-Incrimination.
169	The documents speak for themselves.
170	The documents speak for themselves.
171	The documents speak for themselves.
172	Kao/Lam/SYWSE Defendants deny there was an enterprise. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
173	Company records speak for themselves. To the extent further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
174	Company records speak for themselves. To the extent further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
175	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial. Kao denies the allegation.
176	Documents containing the alleged request speak for themselves.

177	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial. Kao denies the allegation.
178	The alleged documents speak for themselves.
179	The alleged documents speak for themselves.
180	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
181	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
182	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
183	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
184	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
185	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
186	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
187	The enterprise is denied and the documents speak for themselves.
188	The court documents speak for themselves.
189	The court record speaks for itself.

190	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
191	The court record speaks for itself.
192	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
193	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
194	The records speak for themselves.
195	Kao/Lam/SYWSE Defendants deny any enterprise. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
196	Kao/Lam/SYWSE Defendants deny any enterprise. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
197	The documents speak for themselves.
198	Kao declines to respond to this allegation in reliance upon the Privilege against Self-Incrimination.
199	Kao declines to respond to this allegation in reliance upon the Privilege against Self-Incrimination.
200	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
201	The documents speak for themselves. Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
202	Kao denies the allegation.



203	The account documents speak for themselves. Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
204	The balances and transactions can be determined from the underlying records.
205	Defendant Kao declines to respond in reliance upon the Privilege against Self-Incrimination.
206	Kao denies the allegation.
207	The records speak for themselves. To the extent further response is required, Defendant Kao declines to respond in reliance upon the Privilege against Self-Incrimination.
208	Referenced document speaks for itself. Defendant Kao denies confirming and directing a pattern of racketeering activity.
209	Referenced document speaks for itself.
210	Referenced documents speak for themselves. Defendant Kao denies illegality. Kao/Lam/SYWSE Defendants deny being co-conspirators. To the extent further response is required, Defendant Kao declines to respond in reliance upon the Privilege against Self-Incrimination.
211	Referenced documents speak for themselves. Defendant Kao denies illegality. To the extent further response is required, Defendant Kao declines to respond in reliance upon the Privilege against Self-Incrimination.
212	Defendant Kao denies the allegations. Defendants Lam and SYWSE are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.

213	Kao denies there was an enterprise and denies the allegation.
214	The documents speak for themselves.
215	The documents speak for themselves.
216	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
217	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
218	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
219	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
220	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
221	Kao denies there was an enterprise. Any referenced document speaks for itself. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
222	The referenced document speaks for itself.
223	Kao denies there was an enterprise. Any referenced document speaks for itself. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or

	information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
224	Any referenced document speaks for itself.
225	Any referenced document speaks for itself.
226	The documents speak for themselves. To the extent a further response is required, Kao declines to respond to this allegation in reliance upon the Privilege against Self-Incrimination.
227	The document speaks for itself. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
228	The document speaks for itself. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
229	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
230	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
231	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
232	The documents speak for themselves. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
233	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
234	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.

235	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
236	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
237	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
238	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
239	The documents speak for themselves. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
240	The records speak for themselves. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
241	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
242	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
243	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
244	Kao denies there was an enterprise and denies participation in and control of an enterprise. To the extent a further response is required, Kao is without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
245	The company records speak for themselves.

246	The company records speak for themselves.
247	The company records speak for themselves.
248	The company records speak for themselves.
249	The company records speak for themselves.
250	The company records speak for themselves.
251	Kao/Lam/SYWSE Defendants deny an enterprise and are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
252	The company records speak for themselves. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
253	The company records speak for themselves.
254	The company records speak for themselves.
255	The company records speak for themselves. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
256	The company records speak for themselves.
257	The company records speak for themselves. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
258	The assertion is opinion and no response is required. To the extent a response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
259	Kao/Lam/SYWSE Defendants deny any enterprise. To the extent a further response is required, Kao/Lam/SYWSE Defendants are

	without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
260	The documents speak for themselves. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
261	The documents speak for themselves. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
262	The documents speak for themselves. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
263	The documents speak for themselves. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
264	The documents speak for themselves. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
265	The documents speak for themselves. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
266	Kao/Lam/SYWSE Defendants deny any enterprise. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
267	The documents speak for themselves. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
268	The document speaks for itself.

269	Kao/Lam/SYWSE Defendants deny they committed illegal acts and deny a conspiracy. The contents of documents speak for themselves.
270	Defendants Kao and Lam deny the allegation.
271	Kao/Lam/SYWSE Defendants deny they committed illegal acts. To the extent further response is required, Kao declines to respond in reliance upon the Privilege against Self-Incrimination.
272	Defendant Kao denies he committed illegal acts. To the extent further response is required, Defendant Kao declines to respond in reliance upon the Privilege against Self-Incrimination.
273	Defendant Kao denies he committed illegal acts. To the extent further response is required, Defendant Kao declines to respond in reliance upon the Privilege against Self-Incrimination.
274	Kao/Lam/SYWSE Defendants deny they committed illegal acts and deny any conspiracy. The record of any transfer(s) speaks for itself.
275	The records speak for themselves. Defendant Kao denies any conspiracy.
276	The records speak for themselves.
277	The records speak for themselves.
278	Defendant Kao denies the allegations.
279	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
280	Defendant Kao denies the allegation.

281	The records speak for themselves. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
282	Kao denies any illegality. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
283	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
284	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
285	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
286	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
287	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
288	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
289	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
290	Defendant Kao declines to respond to this allegation in reliance upon the Privilege against Self-Incrimination. Defendants Lam and SYWSE are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
291	Defendant Kao declines to respond to this allegation in reliance upon the Privilege against Self-Incrimination. Defendants Lam and SYWSE are without knowledge or information sufficient to



	form a belief as to the truth of the matters asserted, and this operates as a denial.
292	The records speak for themselves. To the extent a further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
293	Kao/Lam/SYWSE Defendants deny fraud. To the extent a further response is required, Defendant Kao and Lam decline to respond to this allegation in reliance upon the Privilege against Self-Incrimination.
294	Kao/Lam/SYWSE Defendants deny fraud. To the extent a further response is required, Defendants Kao and Lam decline to respond to this allegation in reliance upon the Privilege against Self-Incrimination.
295	The records speak for themselves. To the extent a further response is required, Defendant Kao and Lam decline to respond to this allegation in reliance upon the Privilege against Self-Incrimination.
296	Defendant Kao and Lam deny deceitful conduct. To the extent a further response is required, Defendant Kao and Lam decline to respond to this allegation in reliance upon the Privilege against Self-Incrimination.
297	The demand speaks for itself.
298	Ownership of the home is a matter of public record. To the extent a further response is required, Kao/Lam/SYWSE Defendants decline to respond to this allegation in reliance upon the Privilege against Self-Incrimination.
299	The allegations are directed at Defendant Hartman and no response is required. To the extent further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
300	The allegations are directed at Defendant Hartman and no response is required. To the extent further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.

301	The allegations are directed at Defendant Hartman and no response is required. To the extent further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
302	The allegations are directed at Defendant Hartman and no response is required. To the extent further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
303	The allegations are directed at Defendant Hartman and no response is required. To the extent further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
304	The allegations are directed at Defendant Hartman and no response is required. To the extent further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
305	The allegations are directed at Defendant Hartman and no response is required. To the extent further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
306	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
307	This allegation is directed at Defendant Chen and no response is required.
308	This allegation is directed at other parties and no response is required.
309	The allegation lacks sufficient specificity. Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to

	form a belief as to the truth of the matters asserted, and this operates as a denial.
310	The records speak for themselves.
311	Defendant Lam is without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
312	The documents and records speak for themselves.
313	The documents and records speak for themselves.
314	Defendant Lam is without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
315	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
316	The records speak for themselves.
317	The records speak for themselves.
318	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
319	This allegation is directed at Defendant Chen and no response is required.
320	Defendant Kao does not waive any defenses and asserts that the claims are barred by the Arbitration. Defendants Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
321	Defendants Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
322	The allegation incorporates earlier allegations and no response is required. To the extent a further response is necessary, Kao/Lam/SYWSE Defendants incorporate by reference their responses to the earlier allegations.

323	This allegation does not require a response.
324	Kao/Lam/SYWSE Defendants deny the allegations. Kao/Lam/SYWSE Defendants dispute that Pacmar has RICO standing given its alleged status as part of the alleged enterprise.
325	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial. Kao/Lam/SYWSE Defendants dispute that Pacmar has RICO standing given its alleged status as part of the alleged enterprise.
326	Kao/Lam/SYWSE Defendants deny an enterprise, deny Pacmar's standing, and are without knowledge or information sufficient to form a belief as to the other matters asserted, and this operates as a denial.
327	Kao/Lam/SYWSE Defendants deny the allegations.
328	Kao/Lam/SYWSE Defendants deny the existence of an enterprise and deny the allegations.
329	Pacmar's business and locations are matters that should be determined by its records.
330	Kao/Lam/SYWSE Defendants deny an enterprise and deny the allegations.
331	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
332	The allegation is objectionable inasmuch as it presents assertions in an argumentative, compound, and narrative format. Kao/Lam/SYWSE Defendants deny predicate acts and the allegations.
333	Kao/Lam/SYWSE Defendants deny theft and the allegations.
334	Kao/Lam/SYWSE Defendants deny theft and deny predicate acts.
335	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.

336	Kao/Lam/SYWSE Defendants deny an enterprise and are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
337	Kao/Lam/SYWSE Defendants deny an enterprise and are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
338	Kao/Lam/SYWSE Defendants deny an enterprise and are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
339	Kao/Lam/SYWSE Defendants deny an enterprise and are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
340	Kao/Lam/SYWSE Defendants deny an enterprise and are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
341	Kao/Lam/SYWSE Defendants deny an enterprise and deny the allegations.
342	The allegation is objectionable inasmuch as it presents assertions in an argumentative, compound, and narrative format. Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
343	The allegations are denied.
344	The records speak for themselves.
345	Kao/Lam/SYWSE Defendants deny the allegations.
346	The allegation is objectionable inasmuch as it presents assertions in an argumentative, compound, and narrative format. Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
347	The allegation is objectionable inasmuch as it presents assertions in an argumentative, compound, and narrative format. Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.

348	Kao/Lam/SYWSE Defendants deny the allegations.
349	Kao/Lam/SYWSE Defendants deny the allegations.
350	Defendant Lam denies the allegations.
351	Defendant Kao denies the allegations.
352	Kao/Lam/SYWSE Defendants deny the allegations.
353	Kao/Lam/SYWSE Defendants deny the allegations.
354	The allegation is objectionable inasmuch as it presents assertions in an argumentative, compound, and narrative format. Kao/Lam/SYWSE Defendants deny the allegations.
355	The allegation incorporates earlier allegations and no response is required. To the extent a further response is necessary, Kao/Lam/SYWSE Defendants incorporate by reference their responses to the earlier allegations.
356	This allegation does not require a response.
357	Kao/Lam/SYWSE Defendants deny the allegations.
358	Kao/Lam/SYWSE Defendants deny racketeering activity and deny the allegations.
359	Kao/Lam/SYWSE Defendants deny the allegations.
360	The allegation is objectionable inasmuch as it presents assertions in an argumentative, compound, and narrative format. Kao/Lam/SYWSE Defendants deny the allegations.
361	The allegation incorporates earlier allegations and no response is required. To the extent a further response is necessary, Kao/Lam/SYWSE Defendants incorporate by reference their responses to the earlier allegations.
362	This allegation does not require a response.

363	Kao/Lam/SYWSE Defendants deny an enterprise, deny Pacmar's standing, and are without knowledge or information sufficient to form a belief as to the other matters asserted, and this operates as a denial.
364	Kao/Lam/SYWSE Defendants deny the allegations.
365	Pacmar's business and locations are matters that should be determined by its records.
366	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
367	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
368	The documents speak for themselves.
369	The documents speak for themselves. To the extent a further response is required, Defendant Kao declines to respond to this allegation in reliance upon the Privilege against Self-Incrimination.
370	The documents speak for themselves. To the extent a further response is required, Defendant Kao declines to respond to this allegation in reliance upon the Privilege against Self-Incrimination.
371	The documents speak for themselves. To the extent a further response is required, Defendant Kao declines to respond to this allegation in reliance upon the Privilege against Self-Incrimination.
372	Defendant Kao without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial. To the extent a further response is required, Defendant Kao declines to respond to this allegation in reliance upon the Privilege against Self-Incrimination.

373	Defendant Kao is without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
374	Defendant Kao is without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
375	The allegations are directed at Defendant Hartman and no response is required. To the extent a further response is required, the allegation is objectionable inasmuch as it presents assertions in an argumentative, compound, and narrative format. To the extent further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
376	The allegations are directed at Defendant Hartman and no response is required. To the extent a further response is required, the allegation is objectionable inasmuch as it presents assertions in an argumentative, compound, and narrative format. To the extent further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
377	Defendant Kao denies the allegations.
378	Kao/Lam/SYWSE Defendants deny the allegations.
379	Kao/Lam/SYWSE Defendants deny the allegations.
380	The allegation is objectionable inasmuch as it presents assertions in an argumentative, compound, and narrative format. Kao/Lam/SYWSE Defendants deny the allegations.
381	The allegation incorporates earlier allegations and no response is required. To the extent a further response is necessary, Kao/Lam/SYWSE Defendants incorporate by reference their responses to the earlier allegations.



382	This allegation does not require a response.
383	Kao/Lam/SYWSE Defendants deny the allegations.
384	Kao/Lam/SYWSE Defendants deny racketeering activity and deny the allegations.
385	Kao/Lam/SYWSE Defendants deny the allegations.
386	The allegation is objectionable inasmuch as it presents assertions in an argumentative, compound, and narrative format. Kao/Lam/SYWSE Defendants deny the allegations.
387	The allegation incorporates earlier allegations and no response is required. To the extent a further response is necessary, Kao/Lam/SYWSE Defendants incorporate by reference their responses to the earlier allegations.
388	Defendant Kao is without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
389	Defendant Kao denies the allegations.
390	Defendant Kao denies the allegations.
391	Defendant Kao is without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
392	Defendant Kao is without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
393	Defendant Kao is without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.

394	Defendant Kao is without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
395	Defendant Kao denies the allegations.
396	Defendant Kao denies the allegations.
397	Defendant Kao denies the allegations.
398	Defendant Kao denies the allegations.
399	Defendant Kao is without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
400	Defendant Kao denies the allegations.
401	Defendant Kao is without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
402	Defendant Kao is without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
403	Defendant Kao denies the allegations of fraud against him.
404	Defendant Kao is without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
405	The records speak for themselves. To the extent a further response is required, Defendant Kao is without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
406	Defendant Kao denies the existence of an enterprise and is without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
407	Defendant Kao is without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.

408	Defendant Kao is without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
409	The emails speak for themselves. To the extent further response is necessary, Defendant Kao is without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
410	Defendant Kao is without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
411	Defendant Kao is without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
412	Defendant Kao is without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
413	The document speaks for itself.
414	The document speaks for itself.
415	Kao is without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
416	Defendant Kao denies the allegations.
417	Kao is without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
418	Defendant Kao is without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
419	Kao denies the allegations.
420	Kao denies the allegations.
421	The allegation incorporates earlier allegations and no response is required. To the extent a further response is necessary,

	Kao/Lam/SYWSE Defendants incorporate by reference their responses to the earlier allegations.
422	The allegation is objectionable inasmuch as it presents assertions in an argumentative, compound, and narrative format. Kao/Lam/SYWSE Defendants deny the allegations.
423	Kao/Lam/SYWSE Defendants deny the allegations.
424	Kao/Lam/SYWSE Defendants deny the allegations.
425	The allegation incorporates earlier allegations and no response is required. To the extent a further response is necessary, Kao/Lam/SYWSE Defendants incorporate by reference their responses to the earlier allegations.
426	The duties owed by the named Defendants is a matter determined by law.
427	Kao/Lam/SYWSE Defendants deny the allegations.
428	Kao/Lam/SYWSE Defendants deny the allegations.
429	The allegation incorporates earlier allegations and no response is required. To the extent a further response is necessary, Kao/Lam/SYWSE Defendants incorporate by reference their responses to the earlier allegations.
430	These allegations are not directed against the Kao/Lam/SYWSE Defendants. The duties of Defendants Chen are matters for him to respond to. To the extent further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
431	These allegations are not directed against the Kao/Lam/SYWSE Defendants. The duties of Defendant Lum Kee are matters for him to respond to. To the extent further response is required, Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
432	These allegations are not directed against the Kao/Lam/SYWSE Defendants. The duties of Defendant Hartman are matters for him to respond to. To the extent further response is required,

	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
433	These allegations are not directed against the Kao/Lam/SYWSE Defendants. Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
434	These allegations are not directed against the Kao/Lam/SYWSE Defendants. Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
435	The allegation incorporates earlier allegations and no response is required. To the extent a further response is necessary, Kao/Lam/SYWSE Defendants incorporate by reference their responses to the earlier allegations.
436	Kao/Lam/SYWSE Defendants deny unlawful activity. Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
437	Kao/Lam/SYWSE Defendants deny unlawful activity. Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
438	Kao/Lam/SYWSE Defendants deny unlawful activity. Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
439	Kao/Lam/SYWSE Defendants deny unlawful activity. Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
440	Kao/Lam/SYWSE Defendants deny unlawful activity. Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.

441	The allegation incorporates earlier allegations and no response is required. To the extent a further response is necessary, Kao/Lam/SYWSE Defendants incorporate by reference their responses to the earlier allegations.
442	Defendant Kao's duties are determined by law and contract and said duties speak for themselves.
443	This allegation is directed at Defendant Chen. Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
444	This allegation is directed at Defendant Lum Kee. Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
445	This allegation is directed at Defendant Hartman. Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
446	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
447	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
448	Kao/Lam/SYWSE Defendants deny wrongdoing and otherwise deny the allegations.
449	Kao/Lam/SYWSE Defendants deny the allegations.
450	The allegation incorporates earlier allegations and no response is required. To the extent a further response is necessary, Kao/Lam/SYWSE Defendants incorporate by reference their responses to the earlier allegations.
451	Kao/Lam/SYWSE Defendants deny the allegations.
452	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.

453	The allegation incorporates earlier allegations and no response is required. To the extent a further response is necessary, Kao/Lam/SYWSE Defendants incorporate by reference their responses to the earlier allegations.
454	These allegations are directed to other defendants. The Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
455	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
456	These allegations are directed at other defendants. Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
457	Kao/Lam/SYWSE Defendants deny the allegations.
458	Kao/Lam/SYWSE Defendants deny the allegations.
459	Kao/Lam/SYWSE Defendants deny the allegations.
460	Kao/Lam/SYWSE Defendants deny the allegations.
461	The allegation incorporates earlier allegations and no response is required. To the extent a further response is necessary, Kao/Lam/SYWSE Defendants incorporate by reference their responses to the earlier allegations.
462	Defendant Kao declines to respond in reliance upon the Privilege against Self-Incrimination.
463	Defendant Kao denies he committed illegal acts. To the extent further response is required, Defendant Kao declines to respond in reliance upon the Privilege against Self-Incrimination.

464	Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
465	Kao/Lam/SYWSE Defendants deny the allegations.
466	Kao/Lam/SYWSE Defendants deny the allegations.
467	Kao/Lam/SYWSE Defendants deny the allegations.
468	The allegation incorporates earlier allegations and no response is required. To the extent a further response is necessary, Kao/Lam/SYWSE Defendants incorporate by reference their responses to the earlier allegations.
469	These allegations are directed to Defendant Hartman. The Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
470	These allegations are directed to Defendant Hartman. The Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
471	These allegations are directed to Defendant Hartman. The Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
472	These allegations are directed to Defendant Hartman. The Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.
473	These allegations are directed to Defendant Hartman. The Kao/Lam/SYWSE Defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted, and this operates as a denial.



16. Any paragraph or allegation in the SAC that requires an answer from Defendant Kao but was not specifically addressed by Defendant Kao is hereby denied.

17. Any paragraph or allegation in the SAC that requires an answer from Defendant Lam but was not specifically addressed by Defendant Lam is hereby denied.

18. Any paragraph or allegation in the SAC that requires an answer from Defendant SYWSE but was not specifically addressed by Defendant SYWSE is hereby denied.

19. Any portion of any paragraph of the SAC that remains unaddressed, and was required to be addressed, is hereby denied.

### **THIRD DEFENSE**

20. Some or all claims are barred by res judicata and/or by arbitration and award.

### **FOURTH DEFENSE**

21. Not all claims of fraud are pled with particularity.

### **FIFTH DEFENSE**

22. Some or all claims are barred by lack of standing and/or injury.

**SIXTH DEFENSE**

23. Plaintiffs failed to mitigate.

**SEVENTH DEFENSE**

24. Some or all claims are barred by lack of subject matter jurisdiction and/or lack of supplemental jurisdiction.

**EIGHTH DEFENSE**

25. Some or all claims are barred by lack of condition precedent and/or lack of all necessary conditions, injury, proximate cause, pattern, continuity, distinctiveness between Pacmar and the alleged enterprise, predicate acts, and / or other requirements for actions, liability and/or damages under RICO.

**NINTH DEFENSE**

26. Some or all claims are barred by the failure to plead fraud with particularity.

**TENTH DEFENSE**

27. Some claims may be barred by statute of limitation and/or laches.

**ELEVENTH DEFENSE**

28. Some or all claims may be barred by estoppel, ratification, election of remedies, the arbitration, mootness, and/or waiver.

**TWELFTH DEFENSE**

29. Some or all claims may be missing necessary parties.

**THIRTEENTH DEFENSE**

30. Some or all claims may be barred by *in pari delicto*.

WHEREFORE, Kao/Lam/SYWSE Defendants pray as follows:

- A. That the SAC against them be dismissed with prejudice and that Kao/Lam/SYWSE Defendants be awarded costs, attorneys' fees and expenses.
- B. That claims against them be stayed pending completion of related criminal cases and/or investigations.
- C. The Court grant them such other and further relief as this Court may deem just and equitable under the premises.

DATED: Honolulu, Hawaii, May 19, 2023.

/s/ Chuck C Choi

KEITH M. KIUCHI

CHUCK C. CHOI

ALLISON A. ITO

MICHEL A. OKAZAKI

ATTORNEYS FOR DEFENDANTS

MARTIN KAO, TIFFANY LAM AND

SOCIETY OF YOUNG WOMEN SCIENTISTS

AND ENGINEERS